

**UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:	§	Case No. 13-52576-cag
	§	
Leroy Ramirez	§	Chapter 13
Erika Ramirez	§	
	§	
DEBTOR	§	Judge: Craig A. Gargotta

**DEBTORS' MOTION FOR AN ORDER EXTENDING THE TIME TO FILE
DEBTORS' CHAPTER 13 PLAN, SCHEDULES AND STATEMENTS.**

The Debtors, Leroy Ramirez and Erika Ramirez, by and through counsel, hereby request an Order extending the time to file Debtors' Chapter 13 Plan, schedules, statements, pay advices and tax returns pursuant to 11 U.S.C. § 1321, Federal Bankruptcy Rule 1007(c), Rule 3015(b) and Rule 9006(b)(1). The reasons for this Motion are more fully set forth in the enclosed memorandum.

Date: October 9, 2013

Respectfully submitted,

/s/ Joris Robert Vanhemelrijck
Joris Robert Vanhemelrijck (24056468)
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MEMORANDUM IN SUPPORT

On September 25, 2013, Debtors, through undersigned counsel, filed Debtors' emergency Chapter 13 petition in this Court, commencing the present case, Case 13-52576-cag , Pursuant to 11 U.S.C. § 1321, Federal Bankruptcy Rule 1007(c), Rule

3015(b) and Rule 9006(b)(1); Debtors had fourteen (14) days to timely file Debtor's Chapter 13 Plan, Schedules and Statements, or to file a motion requesting an order extending said fourteen (14) day time limit.

Debtors have been diligently attempting to collect all documents and information required for accurately completing Debtors' Chapter 13 plan, schedules, statements, pay advices and tax returns. Nevertheless, for reasons outside Debtors' control, Debtors will need some additional time to accurately complete and/or draft Debtors' plan, schedules and statements and acquire pay advices.

Allowing Debtors the additional time necessary to file Debtors' Chapter 13 plan, schedules, statements, pay advices and tax returns will not unduly prejudice any of Debtors' creditors and will avoid Debtors incurring the substantial hardship and duplicative administrative expenses that would ensue if Debtors had to re-file if Debtors' case were dismissed.

WHEREFORE, Debtors pray that pursuant to Federal Bankruptcy Rules 1007(c), 3015(b) and 9006 (b)(1), this Court will enter an order extending the time to file Chapter 13 plan, schedules, statements, pay advices and tax returns until October 23, 2013, and for any other relief that the Court shall deem appropriate.

Date: October 9, 2013.

/s/ Joris Robert Vanhemelrijck
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NOTICE AND CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing attached motion was served this date via regular US mail and/or electronically as permitted by the Local Bankruptcy Rules on the parties whose names and full addresses are listed below and for NOTICE that the attached motion has been filed.

Date: October 9, 2013

/s/ Joris Robert Vanhemelrijck
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